

EXCERPTS FROM PLAINTIFF'S DEPOSITION TESTIMONY

11 Q. One of the allegations you have
12 against SmithKline is a fraudulent inducement
13 claim. Do you recall that?

14 A. Mm-hmm.

15 Q. Can you tell me the basis of that
16 claim?

17 A. Yes. They said that they were going
18 to provide training and they were going to
19 provide the correct study material and they did
20 not.

21 Q. Do you have any facts or information
22 that at the time the original statements were
23 made, that they were false?

24 A. Oh, no.

1 Q. Okay. And is that the representation
2 that you claim is fraudulent that SmithKline
3 promised to give you the correct and accurate
4 training material?

5 A. I was -- I was assuming that, based
6 upon SmithKline Beecham being one of the leading
7 pharmaceutical companies, I really did assume
8 that they would be organized and have the
9 training prepared.

10 Q. Okay. And then, therefore, give you
11 the correct material to study?

12 A. Correct.

13 Q. But at the time those statements were
14 made, which would relate back to when you first
15 received the original material in early July, you
16 had no information that that was misleading or
17 false statements about the training material?

18 A. I had no reason. I hadn't started it
19 yet. I had no reason to doubt the integrity of
20 the company.

21 Q. Okay. Do you have any facts to
22 support a claim that SmithKline intended to
23 mislead you?

24 A. No.

(TR 504:11 - 505:24)

PLAINTIFFS
EXHIBIT

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